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5

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 VIZALIEL YUMOL, an individual,

Case No.: 2:17-cv-1475

9 Plaintiff,

**Keolis Transit Services, LLC's Petition for  
Removal**

10 vs.

11 MV TRANSPORTATION, INC., a foreign  
corporation; KEOLIS TRANSIT SERVICES,  
12 LLC, a foreign limited-liability company; DOE  
DRIVERS I-V, ROE EMPLOYERS I-V, DOE  
13 OWNERS I-V, ROE BUS COMPANY I-V,  
ROE TRANSPORTATION COMPANY I-V,  
14 and ROE CORPORATIONS I-V, inclusive,  
jointly and severally,

15 Defendants.  
16

17 Keolis Transit Services, LLC petitions to remove this case to the United States District  
18 Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada.  
19 This petition for removal is signed per Rule 11.

20 Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per  
21 28 U.S.C. 1332. Plaintiff Vizaliel Yumol alleges he is a resident of Nevada.<sup>1</sup> Keolis Transit  
22 Services, LLC's sole member is Keolis Transit America, Inc. is a Delaware entity with its  
23 principal place of business in California. Plaintiff alleges injury from a bus accident occurring  
24 on May 7, 2015.<sup>2</sup> On February 25, 2016 Plaintiff wrote to Keolis, demanding \$100,000 to settle  
25 his case.<sup>3</sup> He filed his complaint on May 1, 2017. He filed his first amended complaint on May  
26

27 <sup>1</sup> ECF No. 001-1 at ¶ 1.

28 <sup>2</sup> *Id.* at ¶¶ 9-11.

<sup>3</sup> ECF No. 001-9 at 5.

3, 2017 and served Keolis Transit Services, LLC on May 4, 2017. This petition for removal has been timely filed within 30 days of service.

Attached to this petition are copies of all process, pleadings, and orders served upon Keolis Transit Services, LLC in the state court action.

DATED this 23<sup>rd</sup> day of May, 2017.

WILSON ELSEER MOSKOWITZ  
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#### **CERTIFICATE OF SERVICE**

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on May 23, 2017, I served **Keolis Transit Services, LLC's** **Petition for Removal** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

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